

## REMARKS

In the Office Action mailed November 22, 2005, the Examiner noted that claims 1-14 were pending, and rejected claims 1-14. Claims 1, 3 and 9-14 have been amended, and, thus, in view of the forgoing claims 1-14 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

The Office Action rejects all claims under 35 U.S.C. § 103 over various combinations of Brintzenhofe, Zeng, DeRose, Ardoin and Alam with Brintzenhofe and Zeng being the commonly used references.

The present invention is directed to processing structured documents that include "text" elements, such as might be found in this a structured document version of this response. Typically structured documents can be found on a web page. And particularly about compressing a structured document in a way that combines text elements and "preserves the text relationship" between the elements.

Zeng is being used by the Examiner to allegedly teach the combining of elements. (Note, this feature of the claimed invention noted by the Examiner is about **"combining"** contents of **text elements** relatively at a same position among two records or more of the structured document **to preserve a text relationship between the contents"**).

Zeng is not about structured documents much less structured documents of text. Zeng is about adaptive coding where signals called wavelets are involved and merging occurs only if the same filter is involved ("If the children of a parent node are assigned the same type of filter, the children will be merged and the same type of filter will be assigned to the parent node." - Zeng, paragraph 0034). There is no teaching or suggestion in Zeng of combining text elements much less doing in a way that preserves a text relationship between the contents. For this reason, it is submitted that the invention distinguishes over the prior art and withdrawal of the rejection is requested.

As noted above, Zeng is directed at adaptive coding of image signals. This is from an entirely different field of endeavor than that of the structured document system of the claimed invention. In addition, Zeng is directed to an entirely different problem (adaptive coding of images using filters) from the one addressed by the inventor and invention claimed in this application. A person seeking to improve a structured document system by combining records and preserving text relationships would not look to adaptive coding where the merging is dependent on the same filter being used for what may be merged. As a result, it is submitted that the Zeng reference is from a non-analogous art. For this additional reason, it is submitted that the invention distinguishes over the prior art and withdrawal of the rejection is requested.

The prior art of Brintzenhofe, DeRose, Ardoin and Alam add nothing that cures the deficits in Zeng. In particular, Brintzenhofe separates documents into content, design and media and does not discuss combining elements to compress. DeRose tracks structured documents but also does not discuss combining to compress. Ardoin manages entities but does not compress. Alam discusses handling documents of different formats but says nothing about combining elements to compress.

It is submitted that the invention of independent claims distinguishes over the prior art and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 4 emphasizes the use of element names. The Examiner alleged that Zeng addresses this pointing to figures 6 and 7 and paragraphs 19, 20 and 34. These parts of Zeng say nothing about using names. It is submitted that the dependent claims are independently patentable over the prior art.

It is submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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